## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:	) Chapter 11
W. R. GRACE & CO., et al.,	) Case No. 01-01139 (JKF)
w. R. GRACE & CO., <u>et al.</u> ,	) (Jointly Administered)
Debtors.	) · · · · · · · · · · · · · · · · · · ·
	) Re: Docket No. 13406

## DEBTORS' SUPPLEMENTAL WITNESS DISCLOSURE FOR ADJUDICATION OF PRODUCT IDENTIFICATION, LIMITATIONS PERIODS AND THE LIBBY CLAIMS ISSUES

In accordance with this Court's October 13, 2006 Amended Order Setting Various

Deadlines Regarding Objections to Asbestos Property Damage Claims, Docket No. 13406, the

Debtors hereby submit the following supplemental disclosures for witnesses who may testify in

person or by deposition at the Adjudication of Product Identification, Limitations Periods and the

Libby Claims Issues, as described in the 15<sup>th</sup> Omnibus Objection:

- 1. **William S. Gibson**. Mr. Gibson may testify regarding statute of limitations issues, including, without limitation, notice of property damage claims.
- 2. **Celia Bubb Green**. Ms. Green may testify regarding statute of limitations issues, including, without limitation, notice of property damage claims.
- 3. **Robert McNab**. Mr. McNab may testify regarding statute of limitations issues, including, without limitation, notice of property damage claims.
- 4. **Anthony Koblentz**. Mr. Koblentz may testify regarding statute of limitations issues, including, without limitation, accrual of property damage claims.
- 5. **D. William Miller**. Mr. Miller may testify regarding statute of limitations issues, including, without limitation, accrual of property damage claims.

- 6. **Lindsey Robbins**. Mr. Robbins may testify regarding statute of limitations issues, including, without limitation, accrual of property damage claims.
- 7. **Robert King**. Mr. King may testify regarding statute of limitations issues, including, without limitation, accrual of property damage claims.
- 8. **Bobby F. Craft, Ph.D., CIH**. Mr. Craft may testify regarding statute of limitations issues, including, without limitation, accrual of property damage claims.
- 9. **Al Clancy, MPH, CIH**. Mr. Clancy may testify regarding statute of limitations issues, including, without limitation, accrual of property damage claims.
- 10. **Steven Duran**. Mr. Duran may testify regarding statute of limitations issues, including, without limitation, notice of property damage claims.
- 11. **David Hardin**. Mr. Hardin may testify regarding statute of limitations issues, including, without limitation, notice of property damage claims.
- 12. **Frank Smith**. Mr. Smith may testify regarding statute of limitations issues, including, without limitation, accrual of property damage claims.

In addition to the witnesses listed above, the Debtors reserve the right to call to testify at the hearing: (1) any fact or expert witness listed in Debtors' Preliminary Witness Disclosure for Adjudication of Product Identification, Limitations Periods and the Libby Claims Issues (Docket No. 13587); (2) any fact or expert witness listed on any other party's witness disclosure for the Adjudication of Product Identification, Limitations Periods and the Libby Claims issues; and, (3) any claimant who submitted a property damage claim, as well as any Person that signed any property damage claim form, to testify regarding the facts surrounding the claims(s) that they submitted and/or signed. In addition, the Debtors continue to analyze the PD claims submitted in these Chapter 11 cases and reserve the right to supplement this disclosure with additional fact

and expert witnesses that may be needed to address product identification, limitations periods or Libby claims issues raised by those claims.

Dated: November 22, 2006

KIRKLAND & ELLIS LLP

David M. Bernick, P.C. Lisa G. Esayian Janet S. Baer 200 East Randolph Drive Chicago, IL 60601 (312) 861-2000

and

PACHULSKI STANG ZIEHL YOUNG JONES & WEINTRAUB LLP

Laura Davis Jones (Bar No. 2436) James E. O'Neill (Bar No. 4042) 919 North Market Street, 17<sup>th</sup> Floor P. O. Box 8705 Wilmington, DE 19899-8705 (302) 652-4100

Co-Counsel for the Debtors and Debtors in Possession